

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN THE MATTER OF

**JOSE LUIS CORREA GONZALEZ
XXX-XX-3630
Debtor(s)**

CASE NO. 19-01722-MCF

**CHAPTER 13
ASSET CASE**

**REPLY TO TRUSTEE'S OBJECTION TO PROPOSED POST CONFIRMATION
PLAN MODIFICATION UNDER SECTION 1325**

TO THE HONORABLE COURT:

NOW COMES, debtor through the undersigned attorney and very respectfully prays and states as follows:

1. Debtor will be current with the chapter 13 Trustee on or before February 2, 2021. This is a 100% plan.
2. The plan is sufficiently funded to pay in full the priority claim to ASUME through the plan. However, not all through the chapter 13 trustee. See plan provisions 2.1, 8.3, and 8.5. They are self-explanatory. Debtor has demonstrated as amended schedule I, with its social security administration reduced deposit of \$414 approximately a month still in effect today, dated August 17, 2020 at DK 54 reflects; that he is in fact paying, together with the chapter 13 trustee, the arrears claimed by ASUME directly from the Social Security Administration retention order of approximately \$621.20 monthly still in effect today. See prior schedule I dated December 18, 2019 at DK 36 that reflected his entire social security benefit of approximately \$1,011 as income. See also ASUME certification, attached to DK 63, where it reflects that ASUME has been and will continue to receive payments of approximately \$621.20 from debtor's social security administration retention order. Attached more evidence in support of these payments. Also attached more evidence in support of his social security administration reduced deposits (see DK 55 exhibits). The plan has been paying in full the ASUME claim. Debtor has demonstrated the payments made to ASUME.
3. Debtor need not consider requesting the amendment of ASUME claim. See bankruptcy code section 362 (b) (2) (C)... "The filing of a petition under section 301, 302, or 303 of this title, or of an application under section 5(a) (3) of the Securities Investor Protection Act of 1970, does not operate as a stay...- under subsection (a) - ...with respect to the withholding of

income that is property of the estate or property of the debtor for payment of a domestic support obligation under a judicial or administrative order or a statute..."; See also paragraph 2 in DK 59.

4. The proposed post confirmation modified plan dated August 17, 2020 complies with 11 USC 1322 (a) (2) it does provide for the full payment, in deferred cash payment, of all claims entitled to priority under section 507 of this title, unless the holder of a particular claim agrees to a different treatment of such claim. See paragraph 3 and 4 in DK 59.
5. The certificate from ASUME dated October 20, 2020,(exhibit at DK 63) twenty months after the case was filed reflects the balance owed to ASUME (\$42,088.31) at the time. It reflects that ASUME has been receiving payments both from the Chapter 13 Trustee and from the social security administration retention order. Debtor understands that such amount reflects a reduced ASUME balance from its original claim.

WHEREFORE, it is respectfully requested from this Honorable Court to approve Debtors' post confirmation modified plan dated 8/17/2020.

I HEREBY CERTIFY: that a copy of this motion was electronically filed by debtors using the CM/ECF System which will send a notification to the standing Chapter 13 Trustee and to all registered interested parties. In addition, a copy of this motion was sent by debtors' attorney to the debtors at the address of record and to all creditors and parties in interest appearing in the master address list not registered in CM/ECF.

RESPECTFULLY SUBMITTED
IN CAROLINA, PUERTO RICO, FEBRUARY 1, 2021.

/s/ Ramón F. López
RAMON F. LOPEZ, ESQ. (203813)
RAMON F. LOPEZ LAW OFFICES, P.S.C.
ATTORNEY FOR THE ABOVE NAMED DEBTOR
PO BOX 34173
FT BUCHANAN PR 00934
PHONE (787) 276-0196
RLR.CAR@GMAIL.COM



Certificacion.pdf



GOBIERNO DE PUERTO RICO
Departamento de la Familia
Administración para el Sustento de Menores

Fecha de emisión: 2/1/2021

Issue date:

CERTIFICACION
CERTIFICATE

Nuestro sistema mecanizado contiene la siguiente información:

Our automated case management system has the following information:

A JOSE L CORREA GONZALEZ se le estableció una orden de alimentos, mediante Sentencia, Orden o Resolución.

A child support order for the benefit of JOSE L CORREA GONZALEZ was established through Judgment, Order or Decision.

Caso Case	Pensión fijada Support established	Frecuencia de pago Payment frequency	Fecha último pago Last Payment Date	Balance adeudado Balance	Plan de pagos Payment plan	Fecha en que se estableció plan de pagos Payment plan establishment date	Fecha último pago registrado del plan de pagos Date of last payment for payment plan	Asistencia Económica (TANF)
0257218	\$0.00		1/6/2021	\$39,330.01	\$0.00			

JOSE L CORREA GONZALEZ SI se encuentra acogido/a a la Ley de Quiebras.

JOSE L CORREA GONZALEZ IS under the protection of the Bankruptcy Act.

Tiene 1 obligación(es) de pagos de pensiones alimentarias a través de ASUME.

Has 1 child support obligation(s) through the ASUME

Recibe pensión alimentaria a través de ASUME en 0 caso(s):

Receives child support through ASUME in 0 case(s):

Este documento resume la información contenida en el sistema mecanizado (PRACSES) de la Administración para el Sustento de Menores. Los pagos realizados directamente a la persona custodia no se registran como pagos de pensión alimentaria ni plan de pago. Deberá acudir a la oficina de ASUME donde está asignado su caso para solicitar la acreditación de pagos efectuados fuera de ASUME. El balance de esta Certificación no incluye el mes en que fue expedida. La información de este documento es válida por treinta (30) días, a partir de la fecha de su emisión.

This document summarizes the information contained in the Administration for Child Support Enforcement automated system (PRACSES). Payments made directly to the Custodial Person are neither registered as child support payments nor as payments made for the payment plan. You must visit the ASUME office to which your case has been assigned in order to request to credit these payments. The balance of this Certificate does not include the current month when it was issued. The information contained in this document is valid for thirty (30) days from its issue date.

2021020120210303694814

NOTA DE CONFIDENCIALIDAD: La información contenida en este documento y cualquier anexo del mismo es confidencial y privilegiada y tiene el propósito de que sólo sea utilizado por la persona identificada en el mismo

CONFIDENTIALITY NOTE: The information contained in this document and any attachment is confidential and privileged and has the purpose of being used only by the person identified in it.

Para validar la información contenida en este certificado, favor acceder a <http://www.pr.gov/validacionelectronica/>.

To validate the information herein, please access <http://www.pr.gov/validacionelectronica/>.

ASM-526
REV 07/09

SEI, CORREA, GONZALEZ		722-94936
LA FONTANA		KC550 PUEBLO
317.04.52		
02/11/18 00983		

1582	
------	--

código sobre sus transacciones después del 14 de agosto de 2020 hasta el 15 de septiembre de 2020.			
Página 1			

+ Cuentas		- Cuentas/Pólizas		- Cuentas		= Balance final	
3,727.20		4,955.5		2.00		1,727.7	

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10		000.000	
AmpioCom Va							

ELECTRÓNICOS		Credito		Debito		Credito	
Transf. ATN		08-18 5253		09-01 Depósito		XXXXXX0360	
9978 Baza Carolina J		10.00		Venc. Baza J10		000.000	
Credito		08-18 1595538194508		Depósito		XXX.XX.3630	
Ampio Mpu JS		21.68		Sin. Baza J10			

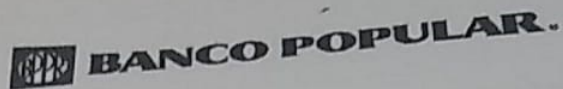
223-049390
ACCESO POPULAR

de 2020 hasta el 14 de diciembre de 2020. Página 1

itos - Cargos = Balance final
2.00 13.99

Fecha	Descripción	Cantidad
12-03	Depósito Ssa Treas 310 Xxsoc Sec XXX-XX-3630	414.40
12-07	Transf. ATH BPPR Plaza Carolina 1 12-07 9735	40.00
12-07	ATH movil Movil 2965 12-05 105814	26.00

Fecha	Descripción	Cantidad
12-01	Pago La Familia Casa D Carolina PR 12-01 XXXXXXXXXXXXXXX1666	102.40
12-01	Pago Ngx Military Stor Carolina PR 12-01 XXXXXXXXXXXXXXX1666	87.45
12-02	ATH movil Movil 1166 12-01 666435	20.50
12-02	ATH movil Movil 1166 12-01 943975	5.50
12-02	Pago Sushi Boat Japane Carolina PR 12-01 XXXXXXXXXXXXXXX1666	17.12
12-02	Pago Tmobile*auto Pay 800-937-8 Wa 12-01 XXXXXXXXXXXXXXX4206	118.6
12-02	Pago Tiendas Capri 09 Carolina PR 12-02 XXXXXXXXXXXXXXX1666	47.4
12-03	Pago Wendys 01 Carolin Carolina PR 12-03 XXXXXXXXXXXXXXX1666	10
12-03	Pago 12-03 XXXXXXXXXXXXXXX4206	5



0

223-049396
ACCESO POPULAR

20 hasta el 13 de enero de 2021.

Página 1

- Cargos
4.00

= Balance final
1,115.38

Descripción

Cantidad

Depósito

XXX-XX-3630

Ssa Treas 310 Xxsoc Sec

418.80

Descripción

Cantidad

Pago

01-01 XXXXXXXXXXXXXXX4206

Tmobile*auto Pay 800-937-8 Wa

118.63

Pago

01-02 XXXXXXXXXXXXXXX1666

Sep Shell Service Carolina

5.00

Pago

01-02 XXXXXXXXXXXXXXX1666

Ngx Military Stor Carolina PR

47.97

Pago

01-02 XXXXXXXXXXXXXXX1666

Econo Facundo Plz Carolina PR

Pago

01-03 XXXXXXX

Econo Facundo Plz

Pago

V

AR RESOURCES
PO Box 1056
Blue Bell, PA 19422

ASUME
PO BOX 70376
San Juan, PR 00936

BANCO SANTANDER
PO BOX 362589
San Juan, PR 00936-2589

BANCO SANTANDER
PO BOX 362589
San Juan, PR 00936-2589

BANK OF AMERICA
PO BOX 982238
El Paso, TX 79998-2235

CARLOS LOZADA
URB. VILLA CAROLINA
AVE. SANCHEZ OSORIO

CARMEN L. DIAZ MARRERO
URB. VILLA FONTANA
VIA 62 3BN7
Carolina, PR 00983

CLARO
PO BOX 70367
San Juan, PR 00936-8367

CMRE
3075 IMPERIAL HWY
SUITE 200
Brea, CA 92821

COX
P.O. Box 78071
Phoenix, AZ 85062-8071

HOME DEPOT
PO BOX 9001010
Louisville, KY 40290-1010

NAVY FEDERAL CREDIT UNION
PO BOX 3000
Merrifield, VA 22119-3000

PROGRESSIVE MANAGMENT SYSTEM
1521 WEST CAMERON AVENUE
West Covina, CA 91790

T-MOBILE
654 AVE MUNOZ RIVERA
SUITE 2
San Juan, PR 00918